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VIA E-MAIL	
TO:	Dale Hoffman-Floerke, Department of Water Resources
FROM:	Roger K. Masuda Butte County Relicensing Coordinator

SUBJECT: Oroville Facilities Relicensing – Recreation Work Group – Preliminary Issues Statements (Rev. 4/23/01)

This memorandum is in response to Patti Kroen/Sue Larsen's April 25 e-mail. The following are Butte County's comments on the above draft document:

- 1. For all Recreation issue statements, the Geographic Scope is identified as the "Area within the Oroville Facilities FERC boundary." While an issue or problem may arise from within the FERC boundary, the mitigation or solution may lie outside of the FERC boundary. I believe that DWR agrees with the preceding sentence and the County requests that a policy statement to that effect be included in the Preliminary Issues Statements document.
- 2. To complete Issue Statement R1, the phrase "operation and maintenance," should be inserted at the end of the first line after "recreation facilities,". The current Recreation issue statements do not directly identify the need for responsive, effective, and efficient operation and maintenance activities to provide a quality recreational experience. New facilities are very important but the new and existing facilities must be properly operated and maintained.

Issue Statement R1 is the all-encompassing issue statement. Issue Statements R2, R3, and R4 are really subsets of R1. This is not a problem unless each Issue Statement is going to carry <u>equal</u> weight vis-à-vis the other Issue Statements and Issue Statements are not going to be prioritized.

3. It is recommended that the following overarching Recreation Goal be placed below the "Recreation" heading and above Issue Statement R1:

The project recreation facilities and their operation and maintenance will provide a quality recreational experience and accommodate current and future recreation demands, opportunities, and access.

- 4. The fourth paragraph in Patti's e-mail memo warns the reviewers to be mindful of the difference between "resource goals" and "desired conditions" or "objectives."
- a. Patti's "objectives" would seem to be better labeled as "tasks" or "activities" or "projects".
- b. The consultants did a good job revising the Issue Statement R1 Resource Goals to eliminate objective-type statements. However, a similar effort was not made on the other Issue Statements' Resource Goals. For example, see the following "objectives" parading as Resource Goals:
  - R3 Resource Goals 1 and 2.
  - R5 Resource Goals 1, 2, and 4.
  - R6 Resource Goals 1 and 2.
  - S1 Resource Goals 1 and 2.
  - S2 Resource Goal 1.
- 5. Issue Statement R3. The County requests that Resource Goal 3 be amended to read: "Determine the adverse recreational impacts of seasonal reservoir drawdowns on recreation use and identify mitigation measures." The County recognizes that some of the mitigation measures may be located outside of the Project area. See Comment #1 above.
- 6. Butte County requests that the following changes he made to the Socioeconomics
- a. The Geographic Scope for all Socioeconomic issues should be "County of Butte."
- b. Add a new Issue Statement S3: "Determine the past, existing, and projected future socioeconomic impacts of the Oroville Facilities and their operation on Butte County and any unrealized socioeconomic benefits and opportunities."
  - c. Add the following as Resource Goals under S3:
  - "1. All past, existing, and projected future adverse socioeconomic impacts of the Oroville Facilities and their operation on Butte County will be fully mitigated by the Project.

"2. Identify and evaluate methods of reliable revenue sources from the Project for local governmental entities."

The socioeconomic issues are very important to the County. The issues need development and study, but to avoid being accused of "gunny sacking," the County is raising these issues now rather than later.

- 6. Need for Recreation Operation and Maintenance Study Beginning this Summer.
- a. When the Recreation Work Group begins the Study Plan Development phase, the County will be requesting a study along the following lines:

DWR to retain three (3) independent recreation experts selected by the Recreation Work Group to evaluate the Department of Parks and Recreation's operation and maintenance of the Lake Oroville recreation facilities, including concessionaire operations, from 1996 to the present. The experts would be expected to evaluation in detail (including finances and personnel allocations) those operations and to make recommendations for improvement. The experts would also be asked to investigate and compare Lake Oroville operations with other comparable DPR and non-DPR run recreation operations.

b. Unfortunately, Lake Oroville will have a very low reservoir level this summer. However, it will give the Recreation Work Group a good opportunity to assess how well DPR operates and maintains the recreation facilities under adverse conditions. Therefore, Butte County requests that the three independent experts be retained as soon as possible to survey DPR's summer operation and maintenance activities.

Please don't hesitate to contact me if you have any questions or need any additional information. Michael Pierce will be at the May 24 Recreation Work Group meeting and can discuss the above matters at that time.

[end of memorandum]

cc: Supervisor Josiassen
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